



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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July 31, 1985 ✓

Mr. Kelly R. Park, President
Aggre-Insulite, Incorporated
8970 Blue Jay Lane
Salt Lake City, Utah 84121

Dear Mr. Park:

RE: Review of MR-1 Form for Aggre-Insulite 1 Mine, PRO/041/013,
Sevier County, Utah

The Division technical staff has reviewed the MR-1 Notice of Intention to Commence Mining Operations and Mining and Reclamation Plan for the Aggre-Insulite 1 Mine.

The following technical deficiencies have been identified and must be addressed before the Division can grant a permit for this operation.

Rule M-3(g) - PGL

The location of stripped waste should be shown on the map.

Rule M-3(2)(c) - PGL

The manner in which the overburden will be deposited must be described.

Rule M-3(2)(d) - PGL

There has been an application for variance from highwall reclamation. However, the volcanic tuff is fairly unstable and retention of highwalls may be unsafe. The applicant should submit a geotechnical analysis of the retained highwall indicating that the highwall will maintain its integrity. If not, the applicant will need to backfill the highwalls to achieve a stable condition.

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Rule M-3(2)(e) - SC

A complete revegetation plan for reclamation of pads, benches and other surface areas disturbed by mining is required. Revegetation by natural invasion as proposed is not acceptable. The revegetation plan must include a final seed mixture and rate of seeding in pure live seed (PLS) per acre, methods of seedbed preparation and seeding and rates and methods of mulching and fertilization.

Protection of reclaimed areas from grazing by livestock should be discussed. If fencing is to be used, the design and location of fencing must be indicated.

Rule M-3(2)(f) - PGL

A reclamation timetable must be included in the reclamation plan.

Rule M-3(5) - RVS

Under #16 on Form MR-1, the applicant indicates future borehole drilling. Accordingly, the applicant must commit to borehole abandonment procedures given under Rule M-3(5).

Rule M-5 - PGL

The applicant must submit a detailed cost estimate for the reclamation at this site. The reclamation cost estimate represents the amount to be posted as a bond if the operator defaulted and the state had to do the reclamation work. References used are the Rental Rate Bluebook, Means Index and Cat Performance Handbook. Will the permit term be for 20 years? Will the applicant escalate the bond for that period of time?

Rule M-10(2)(b) - PGL

How will oil and lubricants be saved? Will the area be bermed? Indicate the area on the map.

Rule M-10(2)(d) - PGL

What type of warning signs will be posted? Please state and indicate where they will be posted.

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Rule M-10(2)(e) - PGL

The highwalls warrant a fence as a barrier for future grazing. This fence must be included in the bond estimate.

Rule M-10(5) - PGL

A stability analysis on the highwalls must show that the highwalls will be stable over a long period of time. Otherwise, backfilling will be required. Cross sections should indicate postmining topography.

Rule M-10(7) - PGL

The applicant states that "roads and pads will be scarred." Please indicate how the roads are surfaced and maintained during operation, and how they will be reclaimed.

Rule M-10(8) - TM

When roads are built to access this site and the actual mine pit area, consideration shall be given to adequate culvert sizing and placement. Any plans to fill in or divert ephemeral drainages must be included in the mine plan and any debris associated with this activity must be removed from natural channels and flood plains for abandonment.

Rule M-10(11) - TM

The site currently proposed potentially crosses several ephemeral drainages. Plans must show how disturbance associated with the mine development shall be conducted in a manner such that sediment from area disturbed in mining or reclamation activities shall not enter these ephemeral drainages.

Rule M-10(12) - SC

In order to set a standard for revegetation success, the applicant must quantitatively sample the ground cover of the surrounding undisturbed vegetation community. The methods to be used for sampling must be clearly described.

If revegetation test plots are to be used as indicated, a more thorough discussion of how they will be designed and monitored to determine final revegetation practices is needed.

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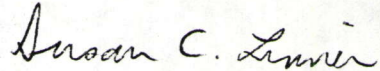
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The Division also noted that the placer claims given in the MR-1 are probably not valid for the material to be mined. Please contact Mr. Bob Randolph with the Bureau of Land Management (phone: 524-3001) to rectify this concern.

Thank you very much for your cooperation in this matter. Please feel free to contact me or John Whitehead of my staff if you should have any questions.

Sincerely,



Lowell P. Braxton
Administrator
Mineral Resource Development
and Reclamation Program

JJW/btb

cc: Steve Cox
Pam Grubaugh-Littig
Ev Hooper
Tom Munson
Rick Smith
John Whitehead

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